

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
Greenbelt Division**

IN RE:

NAHID AHMADPOUR

Debtor.

---

NATIONWIDE REGISTRY &  
SECURITY, LTD.  
C/O O'CONNOR & VAUGHN LLC  
11490 COMMERCE PARK DR., STE 510  
RESTON, VA 20191

Movant,

v.

NAHID AHMADPOUR

Debtor

Laura J. Margulies, Trustee  
Respondents.

---

\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*

Case No: 18-11248 WIL  
Chapter 7

**ANSWER TO THE AMENDED MOTION FOR RELIEF FROM STAY**

COMES NOW Laura J. Margulies, Trustee, and hereby submits this Answer to the Amended Motion for Relief from Stay (the "Amended Motion") filed by Nationwide Registry & Security, Ltd. ("Movant"), and respectfully represents as follows:

1. The Trustee does not oppose Movant's request for relief.

WHEREFORE, the Respondent respectfully requests that this Court grant the Movant's Amended Motion to Lift the Stay; and grant such other and further relief as the cause may require.

Dated: February 20, 2018

Respectfully submitted,

/s/Laura J. Margulies  
Laura J. Margulies, (#06585)  
6205 Executive Blvd.  
Rockville, Maryland 20852  
(301) 816-1600  
trustee@law-margulies.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 20, 2018, a copy of the foregoing Answer To The Amended Motion For Relief From Stay was served electronically via CM/ECF to:

Robert L. Vaughn, Jr., Esq.  
rvaughn@oconnorandvaughn.com  
*Attorney for Movant*

Synchrony Bank  
c/o PRA Receivables Management  
claims@recoverycrop.com

Kevin D. Judd, Esq.  
bkadmin@juddlawfirm.com  
*Attorney for Debtor*

And on February 20, 2018, was served by first class mail, postage prepaid to:

Nahid Ahmadpour  
14316 Kings Crossing Blvd  
Boyd's, MD 20841

Fitzgerald Lewis, Esq.  
6066 Leesburg Pike, 4<sup>TH</sup> Floor  
Falls Church, VA 22041  
*Co-counsel for Movant*

/s/Laura J. Margulies  
Laura J. Margulies